

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com



November 3, 2021

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TO: WESLEY T. YOKOYAMA, P.E.
DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

FROM: ERNEST Y.W. LAU, P.E.
MANAGER AND CHIEF ENGINEER *EYWL*
BOARD OF WATER SUPPLY

SUBJECT: NEW CITY LANDFILL

The Board of Water Supply (BWS) would like to thank you and the Department of Environmental Services (ENV) for reaching out and soliciting our comments to your efforts to find a site for the city's new landfill. We also appreciate your sharing data collected from the existing Waimanalo Landfill and discussing the many criteria and complexities for identifying a new site.

Please know that we understand the need for the new landfill and the extreme challenges with finding a site. However, the proposed sites for the new landfill identified to date are located directly over Oahu's drinking water aquifer. The data we reviewed show that landfills can contain high amounts of contaminants that if released to the aquifer can irreparably damage a resource that cannot be replaced. We realize that modern landfill design and engineering means and methods can reduce the risk of landfill constituents on the environment. However, the consequence of failure can be extremely high even if the probability of a failure can be engineered to be low. While the alternative is to treat groundwater to remove the contamination, if the amount present is at levels that make treatment cost prohibitive then treatment is no longer an option creating an unusable resource. Since all parts of the aquifer are hydrologically connected and groundwater is always moving, contamination in one part of the aquifer can spread and affect other parts of the formation. For these reasons, the BWS does not support siting the new landfill anywhere over our drinking water aquifer.

However, there are still alternatives. The no-pass line was established to protect our aquifer from underground sources of contamination. Areas makai or below the no-pass line are not over the aquifer and deemed acceptable for underground waste disposal. The areas located mauka of the line are not. The new landfill should therefore be sited in areas at or below the no-pass line.

Thank you for the opportunity to express our views and position on this matter. If you have any questions, please feel free to contact me at (808) 748-5061.

Cc: B. Andaya, Chair, Board of Water Supply